

To: Russ, Timothy[Russ.Tim@epa.gov]
Cc: Denawa, Mai[Denawa.Mai@epa.gov]; dubey, susmita[dubey.susmita@epa.gov]
From: Odendahl, Steve
Sent: Thur 11/17/2016 4:17:16 PM
Subject: RE: Conference Call with FHWA - Re: I-70 East Project (9:30am MST!)

Hi Tim – Mai and I let Susmita know about this call; hopefully that's OK with you and hopefully Susmita can join, too.

Steve Odendahl ● Associate Regional Counsel ● US EPA Region 8 ● (303) 312-6219

From: Russ, Timothy
Sent: Thursday, November 17, 2016 8:42 AM
To: Jackson, Scott <Jackson.Scott@epa.gov>; Schuller, Jennifer <Schuller.Jennifer@epa.gov>; Anderson, Carol <Anderson.Carol@epa.gov>; Dresser, Chris <Dresser.Chris@epa.gov>; Rickard, Joshua <Rickard.Joshua@epa.gov>; Odendahl, Steve <Odendahl.Steve@epa.gov>; Denawa, Mai <Denawa.Mai@epa.gov>
Subject: Conference Call with FHWA - Re: I-70 East Project (9:30am MST!)
Importance: High

Hi Everyone,

Ex. 5 - Deliberative Process

Ex. 6 - Personal Privacy

Ex. 6 - Personal Privacy

For those that can attend here in Region 8, I have reserved the Coneflower Room on the 7th floor.

Ex. 5 - Deliberative Process

From: Berry, Laura

Sent: Thursday, November 17, 2016 8:21 AM

To: Karen Perritt <Karen.Perritt@dot.gov>; Russ, Timothy <Russ.Tim@epa.gov>; Patulski, Meg <patulski.meg@epa.gov>; Dresser, Chris <Dresser.Chris@epa.gov>; Jackson, Scott <Jackson.Scott@epa.gov>

Subject: Here's an agenda for 11:30

Hi folks,

Karen, please forward to folks at FHWA attending. Tim, please do the same at R8

Ex. 5 - Deliberative Process

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For our reference, the contents of my draft 11/16/16 email are provided below:

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La Casa (CASA)

Region: Denver

Monitoring Station

4545 Navajo Street

SAROAD:

AQS ID: 080310026

Latitude: 39.779460

Longitude: -105.005124

Reporting capabilities (hourly)

SLAMS: CO, PM10, PM2.5

NAMS: O3, SO2

SPM: NO, RD, RS, TEMP, WD, WS

EPA's November, 2015 PM Hot-spot modeling guidance ("Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM_{2.5} and PM₁₀ Nonattainment and Maintenance Areas") notes the following in section 9.3.4 *24-hour PM₁₀ NAAQS*:

Calculating Design Values and Determining Conformity

The 24-hour PM₁₀ design value is calculated at each receptor by directly adding the sixth-highest modeled 24-hour concentrations (if using five years of meteorological data) to the appropriate monitor value for the 24-hour background concentration from three years of monitoring data, based on Exhibit 9-6.¹⁵³ Exhibit 9-6: Monitor Value Used for Design Value Calculation

Number of Background Concentration Values from the Monitor	Monitor Value Used for Design Value Calculation
< 347	Highest Monitor Value
348 -695	Second Highest Value
696 -1042	Third Highest Value
1043 -1096	Fourth Highest Value

PM₁₀ data from the La Casa monitoring site are provided in the table below:

POC 1 1 in 3 Sampler

Year	N	Highest value	2 nd highest	3 rd highest	4 th highest
2015	119	55	48	44	43
2014	127	66	65	62	62
2013	122	81	73	56	45

“N” = the number of days of valid data recovery.

NOTE: There are actually three PM₁₀ monitors co-located at the La Casa monitoring location. POC#1 is a “1 in 3” sampler and takes a sample every 3rd day; it is our understanding that this is the primary monitor as so designated by CDPHE. POC#2 is a “1 in 6” sampler and takes a sample every 6th day and POC#3 is a continuous monitor and samples every day.

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We were aware before of a Sierra Club comment on the numbers and percentage of trucks on the I-70 East project. They had presented CDOT data that showed higher percentages of trucks than appeared to be used in the I-70 East FEIS. This issue, and using Sierra Club's comments, was also raised by two Denver City Councilmembers, in a letter to EPA dated 4/26/16, as follows:

“To estimate emissions from the highway segment nearest the neighborhoods where pollution levels are expected to be the worst, COOT omitted half of expected truck emissions by using the region wide truck share (4.9%) of VMT rather than the actual truck counts on I-70 (9.8%) reported on CDOT's website. Does the EPA rule require that emissions from actual traffic on the interstate be modeled?”

FHWA provided the below response:

Referred to FHWA

Referred to FHWA

Ex. 5 - Deliberative Process

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Thanks!

Tim

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